

# **EXHIBIT 6**

**To  
PLAINTIFF'S LOCAL RULE 56.1(b)(3)(C) STATEMENT OF ADDITIONAL FACTS  
REQUIRING DENIAL OF THE CITY'S MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

**March 15, 2016**

**Case No. 14-CV-4391**

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Deposition of Nicole Harris - Taken 12/22/2015

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                   |                  |
|-----------------------------------|------------------|
| NICOLE HARRIS,                    | )                |
|                                   | )                |
| Plaintiff,                        | )                |
|                                   | )                |
| vs.                               | )No. 14 CV 04391 |
|                                   | )                |
| CITY OF CHICAGO, Chicago Police   | )                |
| Officers ROBERT BARTIK, #3078;    | )                |
| DEMOSTHENES BALODIMAS, #21204;    | )                |
| ROBERT CORDARO, #20680; JOHN J.   | )                |
| DAY, #20926; JAMES M. KELLY,      | )                |
| #21121; MICHAEL LANDANDO, #20417; | )                |
| ANTHONY NORADIN, #21252; and      | )                |
| RANDAL WO, #20232; Assistant Cook | )                |
| County State's Attorneys ANDREA   | )                |
| GROGAN and LAWRENCE O'REILLY; and | )                |
| the COUNTY OF COOK,               | )                |
|                                   | )                |
| Defendants.                       | )                |

The videotaped deposition of NICOLE HARRIS, called by the Defendants for examination, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Monica Kim, Certified Shorthand Reporter, Registered Professional Reporter, and Notary Public, at 77 West Wacker Drive, Suite 3100, Chicago, Illinois, commencing at 10:17 a.m. on December 22nd, 2015.

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1           **A.**    Yes.

2           **Q.**    And then tell me what you remember next.

3           **A.**    I remember running through the hospital,  
4 through the emergency room. And there was a lady there.  
5 And I remember, like, almost running past her, and I was  
6 like, "Where's Jaquari? Where's Jaquari?"

7                   Then she, like, kind of stopped me, and she  
8 was like, "I'm going to take you to him." And then she  
9 took me to the room where the doctor was.

10                   And Jaquari was laying on the table. He had,  
11 like, wires and stuff. And the doctor said -- And I was  
12 like, "Is he okay? Jaquari? Jaquari?" And I'm, like,  
13 trying to wake him up and --

14           **Q.**    Are you touching him?

15           **A.**    Yeah.

16           **Q.**    The doctors are letting you touch him at that  
17 point?

18           **A.**    Yeah. I'm like, "Jaquari, Jaquari," you know,  
19 "Wake up."

20           **Q.**    Is the doctor in the room at that point?

21           **A.**    Yes.

22           **Q.**    And are there nurses in the room?

23           **A.**    I don't remember if there were any nurses in  
24 the room.

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1 Q. Okay.

2 A. And then he was like, "I'm sorry," you know,  
3 like, "He didn't make it."

4 Q. Is Sta-Von in the room?

5 A. No, no.

6 Q. What happens next?

7 A. So, like, I was, like, crying and screaming.  
8 And then, like -- I don't know -- somehow or another I  
9 left out for him -- When Sta-Von heard me, he was  
10 already on the floor crying. And then, like, I was  
11 crying, like, hugging him or whatever. And then  
12 somebody came with some wheelchairs and took us  
13 somewhere.

14 Q. When you were in the room with the doctor  
15 when -- with -- with -- Jaquari's room, was Diante in  
16 the room with you?

17 A. I'm sorry.

18 Q. Was Diante in the hospital room with you when  
19 you first got in there to see Jaquari?

20 A. No.

21 Q. Where was Diante at?

22 A. I don't remember.

23 Q. Did you run in the hospital by -- like, by  
24 yourself and did Diante stay with Sta-Von?

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1 MS. MOGUL: That's fine.

2 MR. NATHAN: That didn't work.

3 MS. MOGUL: No worries. I just want to -- It's  
4 clear --

5 MS. HOFT: Did you get a response about whether  
6 there's anyone else on the -- his end?

7 MS. MOGUL: There's -- Is there anyone else on the  
8 phone other than Mr. Kamionski?

9 MR. KAMIONSKI: Just me.

10 MS. MOGUL: Okay.

11 MR. HALE: All right. One second.

12 BY MR. HALE:

13 Q. Okay. Do you recall -- Wait. So -- In order  
14 to -- Are you still cold?

15 A. Yeah.

16 Q. In order to take part in a polygraph exam --  
17 That took place at a different building, correct?

18 A. Yes.

19 Q. All right. So you were actually driven from  
20 the police station to another building, right?

21 A. Yes.

22 Q. Do you remember who drove you to the  
23 polygraph?

24 A. I don't remember.

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1 Q. Do you remember what he looked like?

2 A. No.

3 Q. Was there any conversation between you and the  
4 person that drove you on the way to the polygraph?

5 A. I remember being in the car crying and then  
6 saying, "I didn't do it," and, "I'm innocent."

7 Q. And do you remember the driver saying anything  
8 to you?

9 A. That's -- Something to the effect of, "That's  
10 why we're going to take the polygraph exam."

11 Q. All right. Anything else you remember?

12 A. No.

13 Q. Any other things you said or the driver said?

14 A. I don't remember.

15 Q. And when I say, "driver," I mean -- I don't  
16 mean to -- Do you know if there was one or more persons  
17 in the front of the car?

18 A. I don't remember. I believe it was one,  
19 though.

20 Q. Okay. Do you remember if the person was  
21 wearing a uniform or not?

22 A. No. They had on regular clothes like you.

23 Q. Okay. Is it fair to say that that -- you were  
24 transported to the polygraph around 11:30 in the

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1 wrist. And I remember him asking me questions, but I  
2 don't remember what questions.

3 Q. All right. Putting aside what the questions  
4 specifically were, you were able to understand his  
5 questions, correct?

6 A. Yes.

7 Q. And you were able to give answers to those  
8 questions, correct?

9 A. Yes.

10 Q. Okay. Once the exam was completed, Detective  
11 Bartik never -- he personally never told you the  
12 results, correct?

13 A. He told me that I failed.

14 Q. You're sure he used the word "failed"?

15 A. Yes.

16 Q. And did he say anything else when he told you  
17 that you failed?

18 A. Yes. He told me that I was lying and playing  
19 games.

20 MS. MOGUL: And I'm just going to object into --  
21 Strike that.

22 MR. HALE: That wasn't a good objection. Just --  
23 You got it.

24

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1 BY MR. HALE:

2 Q. All right. When he said, "You failed," and  
3 "You're just playing games," did he say anything else at  
4 that -- right then and that -- as part of that?

5 MS. MOGUL: I'm just -- I'm going to -- I  
6 understand what you're trying to do. I'm -- I'm going  
7 to object in that it's leaving out some of her prior  
8 testimony. But I understand you're trying to ask what  
9 happened after that.

10 MR. HALE: Yeah.

11 BY MR. HALE:

12 Q. Well, let me just -- Let me just -- I just  
13 want to be clear on this. He -- He -- I know that  
14 there's -- there's some conversation that takes place.  
15 I want to get through all that, but I just want to kind  
16 of know the order it happened.

17 A. I don't remember the order.

18 Q. Right. But let's just -- Let's just try to  
19 and then we'll --

20 A. Okay.

21 Q. -- I'll ask you after that what else. Okay?  
22 You finished the test, right?

23 A. Yes.

24 Q. You understood at some point the test was



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1 over, right?

2 A. Yes.

3 Q. I mean, either he told you that or you knew it  
4 was done, right?

5 A. Yes.

6 Q. Now, does he, then, leave the room?

7 A. I don't remember.

8 Q. Do you remember him leaving the room once you  
9 stopped answering questions?

10 A. I don't remember.

11 Q. Do you remember being in the room by yourself  
12 for some period of time?

13 A. I don't remember.

14 Q. Okay. But you're saying you do remember him  
15 telling you that you failed?

16 A. Yes.

17 Q. Okay. And when he said, "You failed," in that  
18 same, you know, conversation right then, did he say  
19 anything else at that point?

20 A. I don't remember.

21 Q. All right. When he told you, "You failed,"  
22 did you say anything?

23 A. I said, "How is that possible?"

24 Q. Did he say anything?

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1           **A.**    He said, "You're lying and playing games," and  
2           "You're not telling the truth."

3           **Q.**    All right. And then what happened next?

4           **A.**    I don't remember.

5           **Q.**    Okay. So putting aside the exact order of the  
6           conversation, is there anything else you recall Bartik  
7           saying to you when it was just you and Bartik in that  
8           room other than what you've already told me?

9           **A.**    I don't remember exactly what he said. I  
10          remember him being really nasty and calling me a monster  
11          and, "You're lying. You're playing games." And he was  
12          just really, really harsh. I don't remember exactly  
13          what he said.

14          **Q.**    And to be clear -- And I think my question --  
15          You understand this, but I want to make sure. There was  
16          nobody in that room at that point besides you and  
17          Bartik, correct?

18          **A.**    Not that I remember. There was another  
19          officer in a police sta- -- well, in the polygraph  
20          station, but I don't remember who -- the guy who drove  
21          me there.

22          **Q.**    Right. I'm just talking about, though, when  
23          Bartik is telling you these things, it's just you and  
24          Bartik in a room together, correct?

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1           **A.**    I don't remember.

2           **Q.**    When you say he's being "nasty," can you  
3 describe what you mean by that, what he was doing?

4           **A.**    Yeah. His tone; he was harsh. He was calling  
5 me, like, monster saying I -- basically, accusing me of  
6 killing Jaquari. And he was just really, really nasty,  
7 harsh, and cruel.

8           **Q.**    Do you recall anything else you said to  
9 Detective Bartik when it was just the two of you in that  
10 room?

11          **A.**    Yeah. "I didn't do it."

12          **Q.**    Right. Anything else?

13          **A.**    I was crying, and that's all that I can  
14 remember.

15          **Q.**    When you were taking -- Hold on one second.  
16                At the time you were in the polygraph room  
17 taking the test or with Bartik, you know, could you hear  
18 Sta-Von at all?

19          **A.**    Yes.

20          **Q.**    You could hear him crying?

21          **A.**    Uh-huh, yes.

22          **Q.**    Did you ask any questions about Sta-Von to  
23 Bartik?

24          **A.**    No.

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1           Q.    You and Bartik didn't discuss Sta-Von,  
2               correct?

3           A.    No.   Bartik told me that I was hurting  
4               Sta-Von.   And he opened the door and let me listen to  
5               Sta-Von cry.   He said, "You're hurting people by lying  
6               and not telling the truth."

7           Q.    Couldn't you hear Sta-Von crying with the door  
8               shut?

9           A.    No.

10          Q.    He had to open the door?

11          A.    Yes.

12          Q.    And then you could hear Sta-Von crying?

13          A.    Yes.

14          Q.    And how long did you hear Sta-Von crying for?

15          A.    I don't remember.

16          Q.    What was your reaction to hearing Sta-Von  
17               crying?

18          A.    I was crying.

19          Q.    All right.   So after Bartik -- Well, you --  
20               After you had this interaction with Bartik, is that the  
21               last time you talked to Bartik?

22          A.    I don't remember.   Probably not, but I don't  
23               remember.

24          Q.    All right.   Well, let's -- Let me ask you

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1 this, then: I mean, do you remember any additional  
2 conversations you had with Detective Bartik other than  
3 what you just told me?

4 A. Yeah. He kept badgering over and over and  
5 telling me that I killed Jaquari, I was lying, I was a  
6 monster, this and that. It just kept going on and on.  
7 I don't necessarily remember the specific conversation,  
8 but I do remember him specifically being cruel and harsh  
9 and asking me the same questions over and over and  
10 saying, "You killed Jaquari." And he was very accusing  
11 and harsh towards me.

12 Q. And how long did that last?

13 A. Hours.

14 Q. Hours?

15 A. Yes, that I can remember.

16 Q. Just you and Bartik in that polygraph room?

17 MS. MOGUL: Objection. It mischaracterizes her  
18 testimony.

19 BY MR. HALE:

20 Q. Well, that's what I'm trying to find out. You  
21 know, I'm -- Are you saying all that took place in the  
22 polygraph room, just you and Bartik?

23 A. I'm saying that it happened in the polygraph  
24 place. I don't remember how many hours I was there. I

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1 do remember that I was there for some hours and that  
2 this went on with Bartik for hours. Whether or not we  
3 were in the same room, I don't know.

4 Q. Well, I --

5 A. I don't remember.

6 Q. I've just -- I've just got to make sure I  
7 understand what you remember.

8 A. Uh-huh.

9 Q. So after you've told me all the things you  
10 just told me that Bartik said to you in the polygraph  
11 room -- Okay?

12 A. Uh-huh.

13 Q. What I'm asking you is, how long did that  
14 conversation with Bartik last in the polygraph room with  
15 just the two of you where he was saying these things to  
16 you?

17 A. I don't remember.

18 Q. Is that hours and hours or -- or no?

19 A. I don't remember. A long time. That's the  
20 only thing I remember. A long time.

21 Q. All right. Can you be any more specific than  
22 "a long time"?

23 A. No.

24 Q. Does that mean more than an hour?

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1           **A.**     Immediately, yes.

2           **Q.**     Okay. And is it your contention that there  
3 was no -- at no -- there was no second interview in the  
4 computer room?

5           MS. MOGUL: Object to the form. And it's -- It's  
6 vague in light of what she's already testified to.

7                     Go ahead.

8           BY THE WITNESS:

9           **A.**     I talked to them again in the computer room.  
10 At some point during the interrogation, I talked to the  
11 state's attorney in there; I talked to Cordaro in there.  
12 So there was a back and forth.

13                     But for -- After Diante was taken away, I was  
14 put into the room with a bar. I was shoved in there,  
15 handcuffed to the bar, and I was accused and told I was  
16 under arrest for murder, for murdering my fucking son,  
17 to be -- specifically.

18           **Q.**     All right. So I just want to make sure I  
19 understand your -- your account of events. DCFS comes  
20 and takes Diante out of the room, and then detectives  
21 take you immediately to another room down the hall,  
22 shove you in the room, and handcuff you to what?

23           **A.**     A bar.

24           **Q.**     To a bar.

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1           **A.**    On the wall.

2           **Q.**    And then -- And then do they shut -- Do they  
3           leave?

4           **A.**    No. They stayed in there, accused me.

5           **Q.**    All right. Okay. Isn't it true that what  
6           actually happened is that detectives came back to the  
7           computer room and asked you some additional questions in  
8           the computer room?

9           **A.**    That is not what happened. What happened was  
10          what I just told you, which was that I was removed out  
11          of that room and we walked down the hallway. Diante,  
12          the DCFS guy had him, and he had, like, this little  
13          thing over him like a blanket or sheet or whatever. And  
14          I remember saying, "Be sure to keep him warm."

15                 And we -- As we were standing right there, I  
16          was standing here (gesturing); there was an officer  
17          here. And he shoved me into the room, and then I was  
18          handcuffed to a bar and -- say, "You fucking liar. You  
19          fucking murdered your son. You're under arrest for  
20          murdering your fucking son."

21           **Q.**    Right. I got that. So my question is --

22           **A.**    There was no second questions --

23           **Q.**    All right.

24           **A.**    -- in that first computer room.



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1           Q.    Right.  The -- The officers that took you out  
2   of the computer room into the interview room --

3           A.    Uh-huh.

4           Q.    -- are those the same officers that  
5   interviewed you -- with you in the computer room  
6   earlier, or is it different officers?

7           A.    I don't know who they were.

8           Q.    Okay.  You don't know.  All right.

9                    So isn't it true that what actually happened  
10   was after D- -- after Diante was taken out of the  
11   computer room, Detectives Landando, Balodimas, and  
12   Noradin came into the computer room and asked you -- or  
13   told you that they had information that you had hit your  
14   sons with a belt?

15           A.    That is not true.  I don't remember the names.  
16   As I've told you earlier, once Diante was taken, once he  
17   was down the hall all the way and the DCFS guy had him,  
18   we walked out of the computer room and we walked down  
19   the hall to another room with a bar and a bench in  
20   there, and I was shoved in there and handcuffed to a  
21   bar.

22           Q.    All right.

23           A.    That's what happened.  There were no questions  
24   about, "We have additional information about a belt."

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1 No. We were immediately moved out of that room, and we  
2 walked to another room. And I was shoved in there and  
3 accused of murdering my son.

4 Q. All right. I understand that's -- You've told  
5 me that now.

6 And -- And isn't it true that what actually  
7 happened was --

8 MR. HALE: And I'm adding to what I said.

9 MS. MOGUL: Andy --

10 MR. HALE: I'm entitled to -- I'm -- I don't have  
11 to accept her version. I can tell her my version and  
12 see if it's true or not.

13 MS. MOGUL: I know. And I hear you --

14 MR. HALE: So -- Right.

15 MS. MOGUL: -- Andy. But I'll say two things:  
16 You've asked this repeatedly and then you're compounding  
17 these questions.

18 MR. HALE: Well, what I want to ask is -- Just so  
19 you know, what I've asked her about is being confronted  
20 with the belt. Okay? And now I want to ask her about,  
21 you know, the admission that my clients say was made.  
22 So I have to ask that.

23 MS. MOGUL: Okay. But you know that she -- you've  
24 asked that already --

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1 MR. HALE: No, I haven't asked her that yet, so --

2 MS. MOGUL: Well, you've asked it already and she's  
3 told you --

4 MR. HALE: I know what she's going to say. I've  
5 got to ask the question.

6 BY MR. HALE:

7 Q. So isn't it true that before you left the  
8 computer room, the detectives -- three detectives came  
9 to talk to you; confronted you with information that  
10 they had been told that you had beaten your sons with a  
11 belt; and at that point, you made a spontaneous  
12 admission that you had put a phone cord around Jaquari's  
13 neck and then used the cord from the bedsheet to make it  
14 look like an accident?

15 A. No, that is not true.

16 Q. Isn't it true that before you left the  
17 computer room, those three detectives, after they told  
18 you what I just said, gave you Miranda rights; and when  
19 they asked you if you understood them, you said, "I  
20 understand because I've got a degree in psychology from  
21 Southern Illinois University"?

22 A. That is not true.

23 Q. Okay. According to you, you never said  
24 anything inculpatory that would have -- before you were

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1 placed in that interview room and handcuffed to the  
2 wall, right?

3 A. No, I did not.

4 Q. After -- So under your version, once the  
5 detectives take you out of the computer room --

6 A. Uh-huh.

7 Q. -- and they take you in -- in -- And you said  
8 they shoved you. Tell me -- Tell me -- Can you be more  
9 specific in terms of how they did that?

10 MS. MOGUL: I'm going to object. It's asked and  
11 answered and she's already displayed it for the video.

12 BY THE WITNESS:

13 A. I was shoved the way you shove a person  
14 like --

15 Q. Okay.

16 A. -- "You murdered your fucking son."

17 Q. Can you -- From looking at these pictures, can  
18 you tell me which one shoved you?

19 A. I can't. I don't remember.

20 Q. Cannot?

21 A. I cannot.

22 Q. Okay.

23 MS. MOGUL: Same objection as to my prior objection  
24 to the foundation and form of these pictures taken ten

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1 years later.

2 BY MR. HALE:

3 Q. Okay. All right. Once you claim you got  
4 handcuffed in the interview room -- Let's call that --  
5 Let's just call that the "interview room." Okay?

6 A. Okay.

7 Q. We had the "computer room" and now we have the  
8 "interview room." Did the detectives continue to talk  
9 to you in that room or did they leave?

10 A. I'm sorry. Once we got into --

11 Q. Once you got into that room, yeah.

12 A. The room with the bar?

13 Q. Where they -- Where you say they handcuffed  
14 you.

15 A. Yeah.

16 Q. And what happened after they handcuffed you?

17 A. They handcuffed me. They were all in there.  
18 They were like, "Look at her fucking crying. Yeah, my  
19 daughter does that shit. She's not telling the truth,  
20 You murdered your fucking son. You want to sit here and  
21 play games with us," and, "Those aren't real tears,"  
22 just stuff like that.

23 Q. All right. How many detectives were in the  
24 interview room at that point?

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1           A.    I don't remember.  Maybe like four or five.

2           Q.    Four or five?

3           A.    Uh-huh.

4           Q.    Some of these were people that you had never  
5 met before?

6           A.    I don't remember.

7           Q.    You don't remember their names, correct?

8           A.    I don't remember their names, and I don't  
9 remember their faces.

10          Q.    Okay.  How long did these detectives continue  
11 to say things to you while you were handcuffed to a bar?

12          A.    I don't remember the time frame.

13          Q.    Well, about.  Can you approximate it?

14          A.    No.

15          Q.    I mean, less than ten minutes?

16          A.    More.  Maybe like 15, 20.

17          Q.    Okay.

18          A.    But, again, I don't recall accurately.

19          Q.    All right.  Other than what you've already  
20 told me, is there anything else you remember these  
21 detectives telling you while you're in that interview  
22 room handcuffed to the bar?

23          A.    Yeah.  At some point, I was uncuffed.  They  
24 left out -- I was left in there with one guy.  He was in

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1 a swivel chair. I remember him turning around on it.

2 And he turns around. He say, "You know, Nicole, Sta-Von  
3 said that he thinks that you could have done this."

4 And I said, "That's not possible."

5 So he turned around in his chair; he put his  
6 feet on the wall; and he said, "Do you think that  
7 Sta-Von could have done it?"

8 And I said, "No, I do not. That's not  
9 possible."

10 MR. HALE: And I'm sorry. I -- I had a brain cramp  
11 there. Can you just read her answer back?

12 MS. MOGUL: Can you read the question and answer  
13 back?

14 (Record read as requested.)

15 BY MR. HALE:

16 Q. So you are saying that after -- all the  
17 detectives left except one --

18 A. Uh-huh.

19 Q. -- and he was on a swivel chair?

20 A. Yes.

21 Q. In that room?

22 A. In that room.

23 Q. The door was shut?

24 A. The door was shut.

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1 Q. It's just you and him?

2 A. Just me and him.

3 Q. And he's in a swivel chair; feet up on the  
4 wall?

5 A. Yeah.

6 Q. And other than what you just told me, did he  
7 say anything else to you?

8 A. At that point, I believe he got up -- to the  
9 best of my recollection, he got up and he walked out of  
10 the room, and I was left in the room.

11 Q. Okay. And when he said those things to you,  
12 did you respond?

13 A. I told you what I said.

14 Q. Other than what you told me.

15 A. No.

16 Q. And the chair stayed in the room?

17 A. I'm assuming so. I don't remember if he took  
18 it --

19 Q. Did you wind up --

20 A. -- with him or not.

21 Q. Did you wind up sitting in the chair?

22 A. No. I slept on a hard bench when I -- I  
23 didn't even sleep. That's where I laid at, on the  
24 bench.



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1 Q. Okay.

2 A. -- familiar with it, but things happen. I  
3 have biological siblings that have been raped in foster  
4 homes.

5 Q. All right. I just want to make sure that --  
6 that rape was not -- That's just what you were thinking?

7 A. Yeah, that's what I was thinking.

8 Q. And in terms of promises when you were talking  
9 about promises made to you by the detectives, the  
10 promise that you referred to was that you could go home?

11 A. Yes, that I could go home, that it would be  
12 manslaughter, that my bond would be around \$15,000 so  
13 that my father could be able to come get me out of jail  
14 so we could fight the case from the outside.

15 Q. All right. Let me just make sure I've got  
16 these promises. You said one was that you could go home  
17 if you said what you -- they wanted you to say?

18 A. Yes.

19 Q. The other was that it would only be  
20 manslaughter?

21 A. Yes.

22 Q. Did they indicate that that -- what that  
23 meant?

24 A. I asked what it meant. And they said it's

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1     like something to the effect of not done intentionally  
2     versus first-degree murder.

3           **Q.**    But they didn't tell you that for manslaughter  
4     you don't go to prison, right?

5           **A.**    No.  I don't remember what they told me.  I  
6     know that they told me at that time that I would be able  
7     to go home.

8           **Q.**    But -- But I understand that was one of the  
9     promises.  But in -- When they talked about  
10    manslaughter, they weren't saying that if you -- if it's  
11    manslaughter, you go home, right?

12          **A.**    Yeah.

13          **Q.**    That's the way you took it?

14          **A.**    Yeah.  That's what they said.  They said, "If  
15    you" -- "It will be manslaughter.  You could go home,  
16    get your bond, and you can fight it outside because  
17    you're innocent, right?"  That's what they said.

18          **Q.**    Other than what you've told me already, were  
19    there any other promises made to you by the detectives  
20    that you haven't testified to already?

21          **A.**    That I can remember, the promises that were  
22    made was that if I cooperate and give the statement,  
23    that it would be manslaughter and that I would be able  
24    to go home and fight the case from the outside.  Those